

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

| | | |
|--------------------------|---|--------------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | No. 3:19-cr-083-M-1 |
| |) | Chief Judge Barbara M. G. Lynn |
| RUEL M. HAMILTON |) | |

**MR. HAMILTON'S MOTION
TO ACCELERATE THE BRIEFING SCHEDULE**

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Counsel for Defendant Ruel M. Hamilton

The current schedule has pretrial motions due December 2, 2019, with replies due December 9, 2019. (Dkt. 55.) Because a number of reasons have arisen for dismissing the Indictment (including motions to exclude evidence that would necessitate dismissal), and those issues can now be briefed, Mr. Hamilton filed the following motions early on September 26, 2019:

- (1) Motion to Dismiss for Violations of the Speedy Trial Act;
- (2) Motion to Dismiss for Pre-Indictment Delay;
- (3) Motion to Dismiss for Due Process Violations in the Government's Manufacturing of a Crime;
- (4) Motion to Exclude Hearsay Statements Attributed to the Now-Deceased Carolyn Davis and to Dismiss for a Lack of Evidence; and
- (5) Motion to Preclude Unsworn, Out-Of-Court, Co-Conspirator Statements Pursuant to the Confrontation Clause and to Dismiss for a Lack of Evidence.

Having filed these motions early, Mr. Hamilton believes that the briefing of the motions filed on September 26, 2019 can be accelerated, resolving the case well before trial. With respect to those motions, he suggests that the government's oppositions (if any) be due October 10, 2019, and that he be entitled to file reply briefs due October 24, 2019.

Dated: September 26, 2019

Respectfully submitted,

/s/ Abbe David Lowell

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CERTIFICATE OF CONFERENCE

I certify that on September 24, 2019, I conferred by e-mail with Marcus Busch for the government, who opposed the motion explaining: “It’s possible we could turn our attention to your motions sooner than December but not something I would agree on.”

/S/Christopher D. Man
Christopher D. Man

CERTIFICATE OF SERVICE

I certify that on September 26, 2019, a copy of the foregoing was filed with the Court’s electronic case filing system, thereby effecting service on counsel for all parties.

/S/Abbe David Lowell
Abbe David Lowell